

Exhibit 28

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Staff Complaint Form
Based On Discrimination, Harassment/Sexual Harassment,
Hostile Work Environment or Intimidation

Pursuant to Nevada Revised Statutes 388.132 and 388.135 and WCSD Board Policy and Administrative Regulation 4111.3, the Washoe County School District is committed to maintaining a learning environment that is free from bullying, cyber-bullying, discrimination, harassment, sexual harassment or hostile work environment based on race, national origin or color, age, disability, religious preference, sex (including non-conformity to gender stereotypes), sexual orientation, or gender identity or expression. Intimidation or retaliatory acts are prohibited. This complaint shall remain confidential to the fullest extent allowed by law.

Complainant Information:

Name: Trina Olsen			
Address: [REDACTED]		City	State ZIP
Home Phone: [REDACTED]	Work Phone:	Email: trinaraeolsen@gmail.com	
School or Work Location/Department: Hug High School		Occupation: Assistant Principal	

This complaint alleges (check all that apply):

☐ Discrimination ☐ Harassment ☐ Sexual Harassment
☐ Intimidation ☒ Retaliation ☐ Hostile Work Environment
☒ Bullying ☐ Cyber-Bullying

On the basis of (check all that apply):

☐ Race, color or national origin ☐ Age ☐ Disability ☐ Religious preference
☐ Gender (including non-conformity to gender stereotypes), sexual orientation, or gender identity or expression
☒ Alleged Violations of NRS 388.135

Subject of Complaint:

Name: Whistle Blower Retaliation - Lauren Ford and Roger Gonzalez
Occupation (if known): Area Superintendents Area 2 and 4, WCSD
School or Work Location/Department (if known): I believe Roger Gonzalez is no longer employed by the district; Lauren Ford oversees Area 4

Complaint:

Incident(s) occurred or began on or about (date): Early April, 2017, threat of termination in Dec 2017, "notice of recommendation to dismiss" in June 2018	Time of Occurrence (approximate is acceptable): ongoing
Place of Occurrence (description of area or address). Example: "Room N-99, Anytown High School): Hug High School / Reno NV	
Time and Place that you addressed complaint with supervisor, or reason for not addressing complaint with supervisor: I sent four emails between May and June of 2018 to Roger Gonzalez asking for a meeting to get his help and guidance. He responded by suggesting I filled out an official complaint form, which he attached to his email.	
Description of Incident (Please attach additional information as necessary.): See attachment	

Please attach any and all related documents necessary to the investigation.

Based On Discrimination, Harassment/Sexual Harassment,
Hostile Work Environment or Intimidation

Possible Witnesses:

Name:	Contact Information (if known):
School or Work Location/Department (if known):	Occupation (if known):
Information witness may have:	

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School or Work Location/Department (if known):	Occupation (if known):
Information witness may have:	

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School or Work Location/Department (if known):	Occupation (if known):
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School or Work Location/Department (if known):	Occupation (if known):
Information witness may have:	


Signature of Complainant

7-18-18
Date

To Be Completed by Human Resources

Date Received:

July 18, 2018

To: Washoe County School District
Superintendent Traci Davis

Fr: Trina Olsen, Assistant Principal WCSD
775-233-9347

Dear Superintendent Davis:

NATURE OF COMPLAINT

Whistleblower Retaliation Claim - July 2018

(Items in bold/underline have been attached to this complaint)

I have been retaliated against in my employment as Assistant Principal with the Washoe County School District as a result of my having reported what I believed to have been improper and illegal school district activities. Therefore, I am hereby filing this Whistleblower Retaliation Complaint against the persons that have retaliated against me, specifically Washoe County School District, Area Superintendent Lauren Ford, (who was my supervisor at Hug High when she was principal), and former Area Superintendent Roger Gonzalez.

I filed my original complaints on or about June 4, 2017 and June 19, 2017. These complaints qualify as protected activities and were performed in good faith as my responsibility as a school administrator. I believed my supervisor's conduct, i.e., Lauren Ford's conduct, violated a law, several district regulations, and clear mandates of public policy, so I filed a complaint as I believed was my obligation per District policy. My complaints were submitted in an effort to report possible illegalities, gross mismanagement, and abuse of power which I believe caused a substantial danger to the health and safety of our students and teachers. I did so expecting an investigation would be conducted, not imagining or knowing I would be retaliated against for doing so.

The first complaint (associated with marijuana) involved a statement made by Dean of Students, Jessica Wilson. When I asked, "did you give drugs back to a student?" her reply was "yes, but I only did it because I saw Lauren (Ford) do the same thing just a few weeks ago." Ms. Wilson's statement also corroborates a conversation I had with her the next day that compared her actions to returning a bottle of alcohol to a student. In Lauren Ford's written statement regarding the same

incident, Ms. Ford quoted Ms. Wilson as stating, "she could see how Trina misinterpreted this comment."

Specific Events under Whistleblower Protection:

- A. **Marijuana Complaint:** Reported activity is defined as a "criminal offense" in **Administrative Manual, 5115,** "Student behavior, intervention, and supports" (specifically pages 8-11, 32, and 40);
- B. **Evaluation Complaint:** Reported activity is a mandated public policy as adopted in **Administrative Manual, 4106,** "Guidelines to Evaluation and Supervision" (specifically procedures listed on pages 8-19)

Causal Links to Retaliation:

As a result of filing the above complaints, I have suffered retaliatory actions, including:

- A. After 23 years of discipline-free service and three exceptionally positive observation narratives from my principal/supervisor Lauren Ford preceding my final evaluation, but after I filed the above-referenced complaint concerning my legitimate belief that marijuana had been returned by my principal, she had a sudden and dramatic change in her behavior toward me, resulting in 15 allegations of misconduct asserted within **two Investigatory Due Process letters** which were issued consecutively over an approximate three-week period. One allegation, on the **letter dated May 24, 2017,** had a causal link to the marijuana incident. I received **two Letters of Admonition** as discipline on or about July 19, 2017, which I appealed.
- B. A third **Investigative Due Process letter dated July 19, 2017** from my principal's supervisor, Area Superintendent Roger Gonzalez, included two allegations with a direct causal link to my protected activity of submitting complaints. This IDP came after I emailed Mr. Gonzalez four times between May and early June asking for his guidance and a meeting to discuss the on-campus marijuana concern. Mr. Gonzalez would not meet with me, instead **emailing me with the suggestion to fill out a staff complaint,** which I did, but is now being used against me.

- C. At Non-Binding Mediation held December 6, 2017, I was pressured by the District to resign and sign a confidentiality agreement in exchange for a neutral recommendation and money. When I refused to resign, I was threatened by Virginia Doran that I would be "fired tomorrow." She then conveyed the grounds for dismissal as "you spread false rumors about your supervisor" to a district administrator about the marijuana incident. To rebut that statement of cause, I presented a written statement from the named administrator that I believed proved my innocence to the WCSD's dismissal cause. I refused to resign. I believe the WCSD used Mediation as an arena to intimidate and bully me into resignation without just cause, which caused considerable indignation and fear for my family's financial future.
- D. On June 30, 2018, I received a **Notice of Recommended Dismissal** from Roger Gonzalez. It is my understanding that Roger Gonzalez no longer works for the District. The first reason for dismissal listed on his notice indicates erroneous and false information about my complaint about the marijuana incident. The second stated cause also indicates erroneous and false information about my complaint concerning the evaluation process. Both of these complaints were investigated by Roger Gonzalez, which likely prompted a biased outcome of his investigation as Lauren Ford's direct supervisor. He deemed my complaints as having no merit per Virginia Doran's email in December, 2017.

This Whistleblower Retaliation claim reveals misconduct that has wasted tax dollars and violated public trust in an honest and accountable school district and administration. The underlying purpose of my complaints were to report employer actions that are illegal and violate specific public policies, as I believed I was obligated to do. However, instead of protecting me, these processes were used against me. The retaliation I experienced is due, at least in part, to my engagement in the complaint process.

Accordingly, I respectfully request that you investigate my claim of retaliation and find it to be meritorious, and that as a result of such finding, you withdraw the Notice of Recommended Dismissal.

If you have any questions concerning the above, please contact me. Thank you for your consideration in this matter.

A handwritten signature in black ink, appearing to read "Trina Olsen". The signature is fluid and cursive, with the first name "Trina" and last name "Olsen" clearly distinguishable.

Trina Olsen

cc: Traci Davis, Superintendent
Emily Ellison, Chief Human Resources Officer
Virginia Doran, Director of Labor Relations
Chris Reich, Deputy General Counsel
Michael Langton, Esquire